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UNITED STATES BANKRUPTCY COURT

IN AND FOR THE EASTERN DISTRICT OF WASHINGTON

In re:

No.: **20-00465-WLH11**

**HUSCH & HUSCH, INC.,**

Chapter 11

Debtor.

**MOTION FOR ORDER TO APPROVE  
DEBTOR'S EXECUTION OF:**

- 1. AMENDMENT TO ARTICLES OF  
INCORPORATION OF HUSCH &  
HUSCH, INC.;**
- 2. AMENDMENT TO SHAREHOLDER  
AGREEMENT; AND**
- 3. MINUTES OF A SPECIAL MEETING OF  
THE BOARD OF DIRECTORS AND  
SHAREHOLDERS OF HUSCH &  
HUSCH, INC., A WASHINGTON  
CORPORATION**

Debtor, by its undersigned attorney, moves the court for an order authorizing Debtor to participate in the execution of certain documents, the effect of which is to convert debt and/or claims shareholders hold against Debtor, as unsecured creditors, to non-voting common stock.

Debtor moves the court for an order approving the execution by Debtor and shareholders of the following documents:

1. Amendment to Articles of Incorporation of Husch & Husch, Inc., a copy of which is attached as Exhibit 1 to the notice to creditors regarding this Motion;

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**SOUTHWELL & O'ROURKE, P.S.**  
A PROFESSIONAL SERVICE CORPORATION  
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2. Amendment to Shareholder Agreement, a copy of which is attached as Exhibit 2 to the notice to creditors regarding this Motion; and

3. Minutes of a Special Meeting of the Board of Directors and Shareholders of Husch & Husch, Inc., a Washington Corporation, a copy of which is attached as Exhibit 3 to the notice to creditors regarding this Motion.

This Motion is based upon the records and files herein and upon the Declaration of Allen Husch, Debtor's representative.

DATED this 18<sup>th</sup> day of November, 2020.

SOUTHWELL & O'ROURKE, P.S.

BY: /s/ Dan O'Rourke  
DAN O'ROURKE, WSBA #4911  
Attorney for Debtor

## Motion-2

**SOUTHWELL & O'ROURKE, P.S.**  
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